

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a
California Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS,
INC., a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
Corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants and
Counterclaim- Plaintiffs.

Civil Action No. 04-CV-1199 (SLR)

DECLARATION OF DEBORAH A. FRINCKE

I, Deborah A. Frincke, declare that:

1. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.
2. I am Chief Scientist, CyberSecurity at the Pacific Northwest National Laboratory.
3. The Distributed Intrusion Detection System (DIDS) was a network intrusion detection system. DIDS was described in several publications, including Snapp et al., "Intrusion Detection Systems (IDS): A Survey of Existing Systems and A Proposed Distributed IDS Architecture" (February 1991) and Snapp et al., "DIDS — Motivation, Architecture, and an Early Prototype," Proc. 14th National Computer Security Conference, Washington, DC, Oct. 1991, pp. 167-176.
4. I was involved with demonstrating DIDS at the 1992 National Computer Security Conference (NCSC) held in Baltimore, Maryland on October 13-16, 1992. This

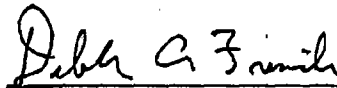
conference was open to the public. In order to demonstrate DIDS to conference attendees, we set up a network of computers upon which we installed and ran DIDS. The demonstration included all components of the DIDS architecture (LAN Monitor, Host Monitor, and Director) and a user interface that graphically displayed to conference attendees DIDS detecting attacks.

5. In preparation for the demonstration, I authored a number of computer scripts, including computer scripts modeling attacks, which exercised the capabilities of DIDS. The purpose of the scripts modeling attacks was to allow those demonstrating DIDS or those conference attendees observing the demonstration to launch attacks against the network of computers that we set up for the demonstration. During part of the demonstration, we used these scripts to launch attacks, simultaneously explaining to the conference attendees the nature of the attack and how DIDS was detecting the attack.

6. The purpose of the demonstration was to disseminate information about DIDS to the public. Because we did not intend to keep secret any details about DIDS, we answered all questions that conference attendees had about the operation and implementation of DIDS. There were no obligations of confidentiality imposed upon the attendees at the demonstration. No attendee was made to sign a non-disclosure agreement, nor was there any expectation that the attendees keep secret any details about DIDS.

7. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Signed on June 29, 2006.



Deborah A. Frincke

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of June, 2006, I electronically filed the foregoing document, **DECLARATION OF DEBORAH A. FRINCKE**, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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Additionally, I hereby certify that on the 30th day of June, 2006, the foregoing document was served via email and by Federal Express on the following non-registered participants:

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